

COMMENT LETTER # 11

BERNARD CARLSON



TAXPAYERS ASSOCIATION OF EL DORADO COUNTY
Post Office Box 13  Placerville, California 95667
Founded in 1958

TO: John D. Webb
California Department of Transportation
District 3
2389 Gateway Oaks Boulevard, Suite 100
Sacramento, California, 98533

FROM: Bernard Carlson, Secretary 
Taxpayers Association of El Dorado County

DATE: July 6, 2006

REGARDING: Shingle Springs Interchange Project, Draft Supplemental Environmental Impact Report, SCH #2001072018, dated May 2006

The Taxpayers Association hereby expresses its opposition to the Shingle Springs Interchange Project and the related gambling casino due to the negative social, economic, environmental, and political impacts it will have on the community and El Dorado County, as has been repeatedly proven throughout the United States.

Paragraph 5.4-5 of the Draft Supplemental Environmental Impact Report states that "The eastbound off-ramp is projected to operate unacceptably at LOS F during the weekday PM peak power and Saturday peak power, and the westbound off-ramp is projected to operate acceptably at LOS D during the AM peak hour." Considering the current heavy county commuter traffic on Highway 50 due to the present county residents, the Shingle Springs Interchange Project should mitigate this problem by increasing Highway 50 to 6 lanes from the 6 lanes section in Sacramento to the proposed Shingle Springs interchange with construction completed before starting construction of the interchange. There is no justifiable reason to increase traffic problems of this magnitude on El Dorado County commuters for a gambling casino.

Paragraph 5.4-9 addresses part of this problem, wherein it would help fix a portion of the heavy traffic, starting from the El Dorado County line to El Dorado Hills Boulevard, but omits the serious congestion from the city of Sacramento to the El Dorado County line. This is covered in Section 10.8 of the Tribal-State Gambling Compact that requires the Tribe to pay its "fair share" to mitigate traffic impacts on Highway 50 beyond the interchange and to mitigate all other significant adverse impacts. Why is there an implied limit of "beyond the interchange", and why doesn't "other significant adverse impacts specify and include those in Sacramento county as described above? Does the Section 10.8 of the Tribal-State Gambling Compact specify a time certain for the completion of this construction? It is paramount that Highway construction be completed before starting construction of the interchange.

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The discussion of various emissions starting with paragraphs 5.5-3 through 5.5-7.2 purports to deal with specific and cumulative concentrations, stating the numerous complex conditions which are involved. It appears that the cumulative concentrations of contaminants, which will occur in the Camino, Pollock Pines areas that are generated by the city of Sacramento, on Highway 50 to the interchange, at the interchange and casino area, the Missouri Flat interchange, and the city of Placerville have not been, but should be, considered.

2 Cont.

The total number of trips of is stated to be 1958 in Table 2, which presumably accounts for the number of pass-by trips that were previously challenged. Since we believe the 1958 number to be quite low, we question how many trips were added for cars going to this proposed new casino that would have otherwise gone to the Jackson Rancheria, Thunder Valley, or taken Highway 80 to Nevada gambling establishments.

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The last paragraph on page 5.5-10 states "*In one instance, those emissions are triple the estimated emissions from the interchange*", referring to those by the County at Missouri Flat versus the casino interchange. This gives rise to question, is Caltrans overselling, or have they underestimated the interchange emissions.

COMMENT LETTER #11 RESPONSE

Comment Letter #11 – Taxpayers Association of El Dorado County

11-1. The commenter expresses opposition to the Interchange Project. Caltrans acknowledges the commenter's opinion.

11-2. This comment recites and asks questions about the traffic mitigation required for the Interchange Project. It also raises a question about the regional nature of the air quality analysis in the 2002 Final EIR.

The comment regarding the traffic mitigation required for the Interchange Project raises issues that are beyond the scope of the Court of Appeal's ruling, having been litigated and decided previously in favor of Caltrans by both the trial court and the Court of Appeal. Accordingly, these issues are beyond the scope of the Supplemental EIR. Also, Caltrans received and responded to similar comments on the 2002 Draft EIR and refers the commenter there for further information. 2002 Final EIR at Responses 41-2, 42-19, 43-DT-4, 51-13. Please also see Response 9-1, above, for more detailed discussion of the traffic mitigation imposed on the Interchange Project.

The comment regarding the air quality analysis in the 2002 Final EIR questions why that EIR did not consider emissions occurring "in the Camino, Pollock Pines areas that are generated by the city of Sacramento, on Highway 50 to the interchange, at the interchange, at the interchange and casino area, the Missouri Flat interchange, and the city of Placerville." In fact, the 2002 Final EIR does consider emissions from and at all of these areas through its use of a regional conformity approach. The commenter is referred to Section 5.5 and Response 43-SR-17 in the 2002 Final EIR, and Sections 5.5-4 and 5.5-7.3 of the Supplemental EIR for further information on this topic.

11-3. This comment appears to question the trip generation estimate in Table 2 in Appendix B of the Supplemental EIR. The comment states that Table 2 contains a total number of trips of 1958. Table 2 does not contain that number, however. The comment also states that traffic generation estimates are low and questions whether trips were added for cars going to the casino that otherwise would have gone to the Thunder Valley casino or other casinos. Please see Response 2-24, above.

The comment also appears to question the number of pass-by trips assumed. The same 40 percent pass-by ratio used in the 2002 Final EIR was used in the Supplemental EIR. Supplemental EIR, App. B at p.2.

11-4. This comment questions the statement on page 5.5-10 of the Supplemental EIR that the emissions from the Missouri Flat area projects are triple the estimated emissions from the Interchange Project in one instance and asks whether "Caltrans is overselling, have they underestimated the interchange emissions." Neither. The statement on page 5.5-10 of the Supplemental EIR is a factual statement based on a comparison between a rigorous analysis of the Interchange Project's emissions and numbers El Dorado County has reported in its environmental review documents.